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8 ANJI DIRISANALA  
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11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA  
13 OAKLAND DIVISION

14 UNITED STATES OF AMERICA,

15 Case No. 11-CR-742-SBA (KW)

16 Plaintiff,

17 v.  
18 VISHAL DASA,  
19 RAMAKRISHNA REDDY KARRA  
20 TUSHAR TAMBE  
21 ANJI REDDY DIRISANALA,  
22 Defendants.

23 STIPULATION AND [PROPOSED] ORDER  
24 CONTINUING HEARING DATE TO  
25 NOVEMBER 29, 2012 AND EXCLUDING  
26 TIME UNDER THE SPEEDY TRIAL ACT

Hearing Date: October 25, 2012  
Time: 9:30 am

27 I. STIPULATION

28 The above-captioned matter is set on October 25, 2012 before this Court for a status hearing. The parties jointly request that the Court continue the matter to November 29, 2012, at 9:30 a.m., before the magistrate, and that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161, between October 25, 2012 and November 29, 2012, so that the defense can have additional time to review and assess the voluminous discovery in this case.

On October 7, 2011, the United States Attorney filed a one-count Information charging defendants with conspiracy to commit visa fraud in violation of 18 U.S.C. §§ 371 and 1546(a).

1 On October 11, 2011, the defendants appeared before the magistrate court, waived Indictment  
 2 and were arraigned. Defendants face a maximum sentence of five years imprisonment on this  
 3 charge.

4 By way of background, this case is related to a larger investigation involving Tri-Valley  
 5 University (“TVU”), which the government has alleged was a sham university that accepted  
 6 foreign students and issued legal status for these students without requiring that they attend  
 7 classes. See Indictment in *United States v. Susan Su*, CR 11-00288-SBA.

8 The four defendants charged in this related case request additional time to review the  
 9 discovery that the government has already produced, which includes voluminous files from TVU  
 10 computers that the government seized and that the defendants need to review. Additionally, the  
 11 defense requested that the government produce additional discovery relating to the broader  
 12 investigation in this case, which the government recently produced. Finally, counsel for Anji  
 13 Dirisanala is unavailable on October 25, 2012. For these reasons, the parties agree that the case  
 14 should be continued until November 29, 2012.

15 The parties stipulate and agree that the ends of justice served by this continuance  
 16 outweigh the best interest of the public and the defendants in a speedy trial. The parties further  
 17 agree that the failure to grant this continuance would unreasonably deny counsel for defendants  
 18 the reasonable time necessary for effective preparation, taking into account the exercise of due  
 19 diligence, and deny continuity of counsel. Accordingly, the parties agree that the period of time  
 20 from October 25, 2012 until November 29, 2012 should be excluded in accordance with the  
 21 provisions of the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), for effective  
 22 preparation of defense counsel and continuity of counsel, taking into account the exercise of due  
 23 diligence.

24 It is so stipulated.

25 Dated: October 17, 2012

By: /s/  
 ANGELA HANSEN  
 Attorney for Defendant  
 VISHAL DASA

26  
 27  
 28 Dated: October 17, 2012

By: /s/  
 GINNY WALIA

1 Attorney for Defendant  
2 RAMAKRISHNA REDDY KARRA  
3

4 Dated: October 17, 2012  
5

6 By: /s/  
7 KENNETH MCGUIRE  
8 Attorney for Defendant  
9 TUSHAR TAMBE  
10

11 Dated: October 17, 2012  
12

13 By: /s/  
14 GALIA A. PHILLIPS  
15 Attorney for Defendant  
16 ANJI DIRISANALA  
17

18 Dated: October 17, 2012  
19

20 By: /s/  
21 WADE RHYNE  
22 HARTLEY WEST  
23 Assistant United States Attorneys  
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3                   **II. ORDER**

4                 Based on the reasons provided in the stipulation of the parties above, the Court hereby  
5 FINDS:

6                 1. Given that this case is related to a larger investigation involving Tri-Valley University  
7 and the Indictment in *United States v. Susan Su*, CR 11-00288-SBA, and that the government  
8 produced discovery to defendants that includes voluminous computer files from the University  
9 that the defense needs to review;

10                2. Given that a complete review of the discovery is necessary to the defense preparation  
11 of the case and that the failure to grant the requested continuance would unreasonably deny  
12 counsel for defendants the reasonable time necessary for effective preparation, taking into  
13 account the exercise of due diligence;

14                3. Given that counsel for Anji Dirisanala is unavailable on October 25, 2012 and a  
15 continuance is necessary for continuity of counsel;

16                4. Given that the ends of justice served by this continuance outweigh the best interest of  
17 the public and the defendants in a speedy trial;

18                Based on these findings, IT IS HEREBY ORDERED that the STATUS date of October  
19 25, 2012, scheduled at 9:30 a.m., before Judge Westmore, is vacated and reset for November 29,  
20 2012, at 9:30 a.m. before Judge Ryu. It is FURTHER ORDERED that time is excluded pursuant  
21 to the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A) and (B)(iv), from October 25, 2012 until  
22 November 29, 2012.

23                IT IS SO ORDERED.

24                Dated: 10/23/12

  
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KANDIS WESTMORE  
UNITED STATES MAGISTRATE JUDGE